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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Ma Olivia Abad,

Plaintiff,

vs.

Equifax Information Services LLC;  
Experian Information Solutions, Inc.;  
JPMorgan Chase Bank, N.A.; Citibank,  
N.A.; Synchrony Financial; Capital One  
Bank, National Association; Bank of  
America Corporation; American Express,  
Inc.; and Discover Bank.

Defendants.

Case No. : 2:25-cv-00090-CDS-DJA

**Joint Motion to Extend Time to Respond  
to Complaint**

**First Request**

Defendant Discover Bank's ("Discover") response to plaintiff Ma Olivia Abad's complaint is due February 12, 2025. Discover has requested, and plaintiff has agreed, that Discover have up to and including March 5, 2025, to respond to plaintiff's complaint. There is good cause for the extension because Discover was only recently retained, and the extension will provide time for the parties to discuss a potential resolution of the claims asserted against Discover without the need for further litigation.

[continued on following page]

1 This is the first request for an extension, and it is not sought for the purposes  
2 of delay.

3 **BALLARD SPAHR LLP**

**Freedom Law Firm, LLC**

4 By: /s/ David E. Chavez

By: /s/ Gerardo Avalos

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9 *Attorneys for defendant Discover Bank*

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11 **ORDER**

12 IT IS SO ORDERED:

13 

14 United States Magistrate Judge

15 DATED: 2/13/2025

**Certificate of Service**

I hereby certify that on February 12, 2025, I caused a true and accurate copy of the foregoing document to be filed with the Clerk of the Court via the CM/ECF system and served upon all parties registered for electronic service in this case.

/s/ David E. Chavez

An employee of BALLARD SPAHR LLP

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